

ORIGINAL

OPEN MEETING
MEMORANDUM



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Arizona Corporation Commission

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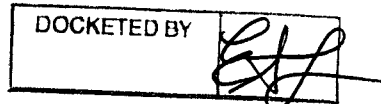
2013 DEC -2 P 3:12

FROM: Utilities Division

DEC 02 2013

AZ CORP COMMISSION
DOCKET CONTROL

DATE: December 2, 2013



RE: IN THE MATTER OF THE APPLICATION OF TOTAL CALL MOBILE, INC. FOR LIMITED DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER (DOCKET NO. T-20870A-12-0500)

1. **Procedural History**

On December 27, 2012, Total Call Mobile, Inc. ("Total Call" or the "Company") filed an Application requesting limited designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act") and implementing rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.101 through 54.207.

In its Application, Total Call requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as a wireless ETC for the sole purpose of receiving federal Universal Service Fund ("FUSF") Lifeline¹ support so that it may provide Lifeline service to qualifying Arizona consumers. Total Call is not requesting high cost support or participation in the Link-Up program.

On February 19, 2013, the Arizona Local Exchange Carriers Association ("ALECA") filed a motion to intervene.

On March 5, 2013, a Procedural Order granted ALECA's request for intervention in this proceeding.

On August 16, 2013, Total Call provided Staff with its informational tariff and Responses to Staff's First Set of Data Requests.

On November 12, 2013, Total Call and ALECA filed a Stipulation concerning Total Call's Application.

2. **Background**

Total Call is a Delaware Corporation, incorporated on August 11, 2005, with its principal offices located at 1411 W 190th St., Suite 700, Gardena, California 90248. Total Call proposes to provide wireless Lifeline services through the resale of Commercial Mobile Radio Service

¹ Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to the ETC is \$9.25.

("CMRS") provided by Sprint PCS ("Sprint"). Total Call currently serves over 100,000 wireless customers nationwide² and has been granted ETC designation in fourteen (14) states³, and Puerto Rico. Total Call currently has petitions for ETC designation pending in sixteen (16) states⁴ in addition to Arizona. Total Call is also awaiting designation as an ETC by the FCC in ten (10) states/jurisdictions⁵. For its proposed designated service area, Total Call provided a list of wire centers in which it will provide service and identified the incumbent local exchange carrier(s) ("ILECs") serving each wire center in Exhibit A contained in Total Call's proposed Informational Tariff provided to Staff on August 16, 2013. Both non-rural and rural ILECs provide wireline service within these areas.

On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link Up Reform and Modernization* ("*Lifeline Reform Order*"),⁶ in which the FCC adopted comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its own facilities ("the own-facilities requirement") subject to certain public safety and compliance obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁷ Specifically, in the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act's Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-only ETC designation, subject to the following conditions: (1) compliance with certain 911 and enhanced 911 (E911) public safety requirements and (2) FCC Wireline Competition Bureau approval of a compliance plan providing specific information regarding the carrier and its service offerings and outlining the measures the carrier will take to implement the obligations contained in the *Order*.⁸

On March 16, 2012, Total Call submitted its initial Compliance Plan to the FCC in order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide Lifeline services. Total Call submitted its Revised Compliance Plan ("RCP") on May 17, 2012,

² Total Call Mobile, Inc. Response to Staff's First Set of Data Requests, dated August 16, 2013, at PJG 1.3.

³ See Application, Page 1 and Supplemental Response to Staff Data Request, dated October 30, 2013, at Question 3: Colorado, Hawaii, Kansas, Maine, Maryland, Michigan, Missouri, Nevada, Ohio, Utah, Texas, West Virginia, Wisconsin, and Wyoming.

⁴ See Application, Page 1, Response to Staff Data Request at PJG 1.47, and Supplemental Response to Staff Data Request, at Question 3: Arkansas, California, Georgia, Idaho, Iowa, Illinois, Louisiana, Minnesota, Nebraska, New Jersey, North Dakota, Pennsylvania, Rhode Island, South Dakota, Vermont, and Washington.

⁵ See Application, Page 1, Response to Staff Data Request at PJG 1.47, and Supplemental Response to Staff Data Request, at Question 4: Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee, and Virginia.

⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

⁷ *Ibid.*, at paras. 368-381.

⁸ See *id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC Rcd 2186 (Wireline Comp. Bur. 2012).

making changes as the result of discussions with FCC Staff. On May 25, 2012, the FCC issued a Public Notice⁹ approving Total Call's May 17, 2012 RCP.

3. Requirements for Designation as an ETC and Total Call's Compliance with the Requirements

Designation as an ETC makes a carrier eligible to receive federal universal service funds. The requirements for designation of ETCs are established in 47 U.S.C. § 214(e)(1), which states:

"A common carrier designated as an eligible telecommunications carrier under paragraph (2) or (3) shall be eligible to receive universal service support in accordance with section 254 and shall throughout the service area for which the designation is received: (A) offer the services that are supported by Federal universal service support mechanisms under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and (B) advertise the availability of such services and the corresponding charges using media of general distribution."

In order to be designated as an ETC, a carrier must offer Lifeline service to all qualifying low-income customers within its service area.¹⁰ Lifeline service provides basic telephone service, typically by passing on discounts to monthly telecommunications charges. As a wireless reseller of prepaid wireless service, Total Call is proposing to offer qualified customers a free handset, free customer care calls, free balance inquiries, access to voice mail, caller I.D. and call waiting features at no additional charge, plus the choice of one (1) of five (5) different prepaid calling plans.¹¹ Total Call also proposes to offer customers the capability of purchasing additional bundles of minutes and service.¹²

As indicated above, the FCC granted Total Call forbearance from the own-facilities requirement that it provide service using its own facilities or a combination of its own facilities and resale of another carrier's service and also any criteria related to facilities build out plans. Total Call would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other criteria required of ETCs.

⁹ See "Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications, Budget Prepay, Consumer Cellular, Global Connection, TerraCom and Total Call Mobile", Public Notice from FCC Wireline Competition Bureau, WC Docket Nos. 09-197 and 11-42 (rel. May 25, 2012).

¹⁰ 47 C.F.R. §§ 54.405 and 54.411(a)

¹¹ See Application, Pages 4 -5 and Response to Staff Data Request at Attachment A. Lifeline Plan 1 offers 250 anytime minutes per month with an option of using text, inbound or outbound which consumes 1 Plan minute per text. Lifeline Plans 2, 3, 4, and 5 allows eligible customers to apply the Company's Lifeline discount of \$10.00 to either the Company's 1000 Talk & 1000 Text retail plan (Lifeline Plan 2), regularly priced at \$29.99 per month, or to the Company's 30-day Unlimited Talk retail plan (Lifeline Plan 3), regularly priced at \$29.99, or to the Company's 30-day Unlimited Talk & Text retail plan (Lifeline Plan 4), regularly priced at \$39.99, or to the Company's 30-day Unlimited Talk, Text & Data retail plan (Lifeline Plan 5), regularly priced at \$49.99.

¹² See RCP, page 21.

A. Offering the Services Designated for Support

47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to receive Federal universal service fund support. The services and Total Call's response to the provision of each service are as follows:

- (1) Voice grade access to the Public Switched Network. Total Call states¹³ that it provides voice grade access to the public switched telephone network through the purchase of wholesale CMRS services from Sprint.
- (2) Local usage. Total Call states¹⁴ it will provide Lifeline customers with minutes of use for local service at no additional charge to customers, as required by the FCC.
- (3) Access to emergency services. "An ETC must provide its customers with access to 911 and E911 emergency services. Total Call states¹⁵ that all of its customers will have access to emergency calling services and that 911 and E911 access will be available from Total Call's handsets even if the account associated with the handset has no minutes remaining.
- (4) Toll Limitation for Qualifying Low-Income Consumers. "ETCs must provide toll limitation services to qualifying low-income customers, unless their Lifeline offering does not distinguish between the pricing of toll and non-toll calls. Total Call's wireless calling plans do not distinguish between non-toll (i.e., local) and toll. Total Call's prepaid plans include a specific number of minutes that cannot be exceeded. Therefore, customers cannot incur any charges for excessive toll calling or be disconnected for non-payment.

In its Application, Total Call states¹⁶ that it has the ability to provide all of the supported services and functionalities required in the proposed ETC designated service area to all subscribers taking service under its Lifeline plan through wholesale arrangements with its underlying carrier. Based on the above information and explanations, Staff believes that Total Call meets this ETC designation criteria.

B. Advertising of Supported Services

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. Total Call states it will advertise the availability of its supported services and the corresponding rates and charges in a manner designed to inform

¹³ Application, Page 11.

¹⁴ Application, Pages 11-12.

¹⁵ Application, Page 12.

¹⁶ Application, Pages 4 and 11.

the general public.¹⁷ Total Call's advertising will occur through a combination of media channels, such as point of sale materials, brochures, direct mail, other printed materials, retail outlets, and the Internet. Advertisements will be in both English and Spanish. Total Call submitted examples of prior relevant advertisements to Staff. In addition, Total Call submitted an example of its English version advertisement in its RCP to the FCC.¹⁸

Based on the information above and Total Call's advertising materials provided to Staff, Staff concludes that Total Call will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Staff believes that Total Call meets this ETC designation criteria.

C. Additional ETC Requirements

In addition to the requirements listed above, the FCC adopted, in the *Lifeline Reform Order*, comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste, and abuse within the system. Below are the additional requirements and Total Call's response to each requirement.

C.1 A Commitment and Ability to Provide Supported Services

In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

- (i) Certify that it will comply with the service requirements applicable to the support that it receives; and
- (ii) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each applicant shall estimate the area and population that will be served as a result of the improvements. Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan.¹⁹

Total Call states²⁰ that it will provide Lifeline service to qualifying customers requesting Lifeline services throughout its requested designated services area, pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). Total Call states²¹ that it will provide service to requesting qualifying customers on a timely basis or within a reasonable period of time in accordance with the rule. The requirement directing submissions of a formal network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii) demonstrating how universal service funds will be used to improve coverage, signal strength, or capacity that would not

¹⁷ Application, Page 13.

¹⁸ See Exhibit 4 of the RCP.

¹⁹ *Lifeline Reform Order*, ¶ 386.

²⁰ See Application, Page 11.

²¹ Response to Staff Data Request PJG 1.7.

otherwise occur absent the receipt of high-cost support, does not apply to this Application because Total Call is seeking only to provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the facilities-based requirements for Total Call.

Based on the above information, Staff believes that Total Call meets this ETC designation criteria.

C.2 Remain Functional in Emergency Situations

In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”²²

To demonstrate its ability to remain functional in emergency situations, Total Call states²³ that it purchases wireless network services on a wholesale basis from Sprint that is itself subject to various regulatory requirements to remain functional in emergencies. Through Sprint, Total Call provides to its customers the same ability to remain functional in emergency situations as currently provided by Sprint to its own customers, including access to a reasonable amount of backup power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations. Therefore, through its underlying carrier(s), Total Call states it has the ability to remain functional in emergency situations.

Based on the above information, Staff concludes that Total Call has demonstrated its ability to remain functional in emergency situations by maintaining a reasonable amount of back-up power. Staff believes that Total Call meets this ETC designation criteria.

C.3 Satisfy Consumer Protection and Service Quality Standards

In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application.²⁴ The sufficiency of other commitments will be considered on a case-by-case basis.

To demonstrate its ability to satisfy consumer protection and service quality standards, Total Call states²⁵ that it commits to exceptional customer service standards, and also commits to comply with the Cellular Telecommunications and Internet Association’s (“CTIA”) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Total Call affirms its

²² *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“*ETC Minimum Requirements Report and Order*”), ¶ 25.

²³ Response to Staff Data Request PJG 1.18.

²⁴ *ETC Minimum Requirements Report and Order*, ¶ 28.

²⁵ Application, Pages 16-17.

commitment to satisfy applicable consumer protection and service quality standards if certified as an ETC.

Based on the above information, Staff believes that Total Call meets this ETC designation criteria.

C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*²⁶ the FCC provides guidance on specific information to be considered when determining if an applicant meets this requirement:

“...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.”

To demonstrate that Total Call is financially and technically capable of providing Lifeline service, Total Call states²⁷ that it has been in business for six years and began providing telecommunications services in Arizona on January 27, 2006. Total Call currently derives the majority of its revenue from its operations (reselling wireless telecommunications services and/or providing Lifeline telecommunications services) in the states of Michigan, Missouri, Nevada, and California. Total Call states²⁸ it has not and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. As noted on page 2 above, Total Call currently has ETC designation to provide wireless Lifeline services in fourteen (14) states, and Puerto Rico, and currently has petitions for ETC designation pending in sixteen (16) states, excluding Arizona. Total Call is also awaiting designation as an ETC by the FCC in ten (10) states/jurisdictions. Each of Total Call's six senior management team members average over seventeen (17) years' experience in the telecommunications industry. Further, it has not been subject to any enforcement action at the FCC or in any state and that no ETC designations held by Total Call have been rescinded, revoked or terminated by the FCC or by any state.

²⁶ See *Lifeline Reform Order*, ¶388.

²⁷ See Application, Page 18 and Response to Staff Data Request PJG 1.14.

²⁸ See Total Call's RCP, Page 23.

Having reviewed financial statements of Total Call's ultimate parent organization, KDDI Corporation²⁹, the technical experience of Total Call's senior management, and based on the above information, Staff believes that Total Call meets this ETC designation criteria.

C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline Service Plans

In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, including details on the number of minutes provided as part of the plan, additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers plans to Lifeline subscribers that are generally available to the public, it may provide summary information regarding such plans, such as a link to a public website outlining the terms and conditions of such plans.

Total Call provided Staff with its informational tariff³⁰ in which it describes the calling plans for Lifeline subscribers, including the number of free minutes in each calling plan, along with the terms and conditions of Lifeline service as provided by Total Call. Based on the information contained in Total Call's informational tariff, Staff believes that Total Call meets this ETC designation criteria.

D. Steps to Limit Fraud, Waste and Abuse of the FUSF

In the *Lifeline Reform Order* the FCC adopted various new measures and revised or eliminated other existing measures in order to limit fraud, waste and abuse of the FUSF. These measures include establishing uniform eligibility criteria to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per household, initial certification and annual re-certification of consumer eligibility, establishing a national lifeline accountability database to ensure and enforce the one-per-household requirement, total elimination of toll limitation support for wireless carriers and a tapered elimination of toll limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-recognized tribal lands and establishing additional provisions for Universal Service Administrative Company ("USAC") audits.

In its RCP, Total Call outlines the steps it will take to limit fraud, waste and abuse of the FUSF and to comply with all applicable Lifeline requirements and implement measures to prevent fraud, waste, and abuse.

²⁹ See Application, Page 18 and Response to Staff Data Request PJG 1-17, Total Call Mobile, Inc. is wholly-owned by Total Call International, Inc. Total Call International, Inc. is wholly-owned by KDDI America, Inc. KDDI America, Inc. is a wholly-owned subsidiary of KDDI Corporation.

³⁰ Response to Staff Data Request PJG 1.4 at Attachment B.

E. Public Interest Determination

Under Section 214 of the Act, the FCC and state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity for rural areas. They also must consider whether an ETC designation serves the public interest consistent with Section 254 of the Act. Congress did not establish specific criteria to be applied under the public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service, ensuring the availability of quality telecommunications services at just, reasonable, and affordable rates, and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.³¹ Accordingly, before designating a carrier as an ETC, the Commission must make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.

Total Call states that by designating it as a wireless ETC in Arizona, it will serve the public interest and the needs of low-income customers in Arizona by increasing customer choice in the areas it serves. The public interest benefits associated with Total Call's wireless service include larger local calling areas (as compared to traditional wireline carriers), the convenience and personal security afforded by mobile telephone service, the opportunity for customers to receive a high-value wireless plan and emergency services in accordance with FCC Rules. Additionally, ETC status will promote universal service by allowing Total Call to offer wireless service to many low-income customers who may not be able to otherwise have service. Total Call's Lifeline calling plans are designed to provide service to Lifeline consumers who, due to credit or deposit requirements, may not be able to obtain telephone service from more traditional wireline and wireless service providers.

F. Designated Service Area

The Commission must establish a geographic area for the purpose of determining universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. § 214(e)(2); 47 C.F.R. § 54.201(b). Total Call requests that the Commission designate it as an ETC for service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona, Total Call will provide Lifeline service in many wire centers in the State of Arizona.

There are a number of wire centers that encompass both tribal lands and non-tribal lands. Some of the tribal lands are served by tribally-owned telephone companies and some of the tribal lands are served by non-tribally owned telephone companies. For those wire centers that encompass tribal lands, Total Call requested to serve the non-tribal areas of each wire center and to serve tribal lands within the service areas of Commission regulated telephone companies and

³¹ *ETC Minimum Requirements Report and Order*, ¶ 40.

cooperatives only after receiving any and all necessary licenses or other forms of approval that might be required by any Tribe and filing a copy of such licenses or other form of approval with the Commission, with a copy to ALECA's undersigned counsel. Attachment 1 of the Recommended Opinion and Order contains the list of wire centers to be served by Total Call.

4. Intervenor

A. Arizona Local Exchange Carriers Association

The Arizona Local Exchange Carriers Association ("ALECA") is an association of telephone companies and member-owned cooperatives providing local exchange telecommunications services to customers in rural, high cost areas of Arizona. All of ALECA's members are "rural telephone companies" as defined by the Act. ALECA represents telephone companies and cooperatives that are regulated by the Commission as well as Tribally-owned telephone companies which are not regulated by the Commission.

B. Joint Stipulation

On November 12, 2013, ALECA and Total Call filed a Stipulation in the docket. In the Stipulation, to address the potential concerns expressed by ALECA, Total Call agreed not to provide Lifeline service to eligible residents residing on Federally-recognized Tribal Lands in Arizona until Total Call obtained any and all necessary licenses or other forms of approval that might be required by any Tribe and file a copy of such licenses or other form of approval with the Commission in this docket and a copy to ALECA's counsel. In addition, Total Call agreed that its Lifeline enrollment application for Arizona will require an applicant to provide a street address and include a provision that requires an applicant to self-certify under penalty of perjury that they do not reside on Federally-Recognized Tribal Lands or to identify the Federally-Recognized Tribe on the lands of which he or she resides.

Staff understands that the only Federally-Recognized Tribal Lands that are included in the Joint Stipulation are those served by Commission-regulated telephone companies and cooperatives and for which Total Call has obtained any and all necessary licenses or other forms of approval that might be required by any Tribe.³²

5. Staff Recommendations

In addition to the conditions set forth by the FCC, Staff recommends Total Call's Application for designation as an ETC be granted subject to the following conditions:

³² In order to provide Lifeline services on Federally-Recognized Tribal Lands served by Tribally-owned telephone companies, Total Call would need to petition the FCC for ETC designation in order to receive FUSF reimbursement.

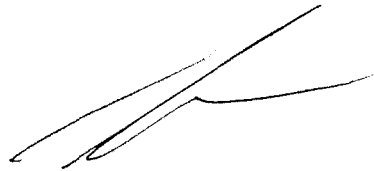
- a. Total Call shall file a tariff, in this docket through Docket Control, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;
- b. Total Call shall notify the Commission of any future changes, through Docket Control, to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
- c. Total Call shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision in this matter and shall concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
- d. Total Call shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control in this docket;
- e. Total Call shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket within thirty (30) days of a Commission decision in this matter;
- f. In the event that Total Call requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107 and any other requirements under Federal law;
- g. Total Call shall submit in Docket Control an annual report by April 15th of each year, beginning April 15, 2014, that contains its total number of Lifeline subscribers and the total amount of Federal USF support received as of December 31 of the previous year and include an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support received per line. The annual filing shall be submitted as a compliance item in this docket;
- h. In the event of a Transfer of Control that involves Total Call, a new ETC petition shall be filed with the Commission. This will ensure ETCs undergoing reorganization remain financially viable and able to provide the supported services throughout the designated service areas as originally approved by the Commission;
- i. Total Call shall not expand its Lifeline service beyond the designated service area specified in this Application without acquiring ETC designation from the Commission to serve the additional area; and

THE COMMISSION

December 2, 2013

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- j. Total Call shall not provide Lifeline service to eligible residents residing on Federally-Recognized Tribal Lands in Arizona, served by Commission regulated telephone companies and cooperatives, until after Total Call has obtained any and all necessary licenses or other forms of approval that might be required by any Tribe and filed a copy of such licenses or other form of approval with the Commission in this docket, with a copy to ALECA's undersigned counsel.



Steven M. Olea
Director
Utilities Division

SMO:PJG:sms\MAS

ORIGINATOR: Pamela J. Genung

BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP
Chairman
GARY PIERCE
Commissioner
BRENDA BURNS
Commissioner
BOB BURNS
Commissioner
SUSAN BITTER SMITH
Commissioner

IN THE MATTER OF THE APPLICATION
OF TOTAL CALL MOBILE, INC. FOR
LIMITED DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS.

DOCKET NO. T-20870A-12-0500

DECISION NO. _____

ORDER

Open Meeting
December 17 and 18, 2013
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On December 27, 2012, Total Call Mobile, Inc. ("Total Call" or the "Company") filed an Application requesting limited designation as an Eligible Telecommunications Carrier ("ETC") pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act") and 47 U.S.C. § 214(e) and implementing rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.101 through 54.207.

2. In its Application, Total Call requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as a wireless ETC for the sole purpose of receiving federal Universal Service Fund ("FUSF") Lifeline¹ support so that it may provide Lifeline service to ...

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1 qualifying Arizona consumers. Total Call is not requesting high cost support or participation in
2 the Link-Up program.

3 3. On February 19, 2013, the Arizona Local Exchange Carriers Association
4 ("ALECA") filed a motion to intervene.

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11 BACKGROUND

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21 ("ILECs") serving each wire center in Exhibit A contained in Total Call's proposed Informational
22 ...
23

24 ² Total Call Mobile, Inc. Response to Staff's First Set of Data Requests, dated August 16, 2013, at PJG 1.3.

25 ³ See Application, Page 1 and Supplemental Response to Staff Data Request, dated October 30, 2013, at Question 3:
26 Colorado, Hawaii, Kansas, Maine, Maryland, Michigan, Missouri, Nevada, Ohio, Utah, Texas, West Virginia,
27 Wisconsin, and Wyoming.

28 ⁴ See Application, Page 1, Response to Staff Data Request at PJG 1.47, and Supplemental Response to Staff Data
Request, at Question 3: Arkansas, California, Georgia, Idaho, Iowa, Illinois, Louisiana, Minnesota, Nebraska, New
Jersey, North Dakota, Pennsylvania, Rhode Island, South Dakota, Vermont, and Washington.

⁵ See Application, Page 1, Response to Staff Data Request at PJG 1.47, and Supplemental Response to Staff Data
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North Carolina, Tennessee, and Virginia.

1 Tariff provided to Staff on August 16, 2013. Both non-rural and rural ILECs provide wireline
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5 comprehensive reforms to the low-income program to revise and modernize the Lifeline service
6 requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that
7 Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its
8 own facilities ("the own-facilities requirement") subject to certain public safety and compliance
9 obligations, was appropriate for carriers seeking to provide Lifeline-only service.⁷ Specifically, in
10 the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act's
11 Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-
12 only ETC designation, subject to the following conditions: (1) compliance with certain 911 and
13 enhanced 911 (E911) public safety requirements; and (2) FCC Wireline Competition Bureau
14 approval of a compliance plan providing specific information regarding the carrier and its service
15 offerings and outlining the measures the carrier will take to implement the obligations contained in
16 the *Order*.⁸

17 8. On March 16, 2012, Total Call submitted its initial Compliance Plan to the FCC in
18 order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide
19 Lifeline services. Total Call submitted its Revised Compliance Plan ("RCP") on May 17, 2012,
20 making changes as the result of discussions with FCC Staff. On May 25, 2012, in DA 12-828, the
21 FCC issued a Public Notice⁹ approving Total Call's May 17, 2012 RCP.

22 ...

23
24 ⁶ *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed*
Rulemaking, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

25 ⁷ *Ibid.*, at paras. 368-381.

26 ⁸ *See id.* at paras. 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans
pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of*
Compliance Plans Pursuant to the Lifeline Reform Order, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC
27 Rcd 2186 (Wireline Comp. Bur. 2012).

28 ⁹ *See* "Wireline Competition Bureau Approves the Compliance Plans of American Broadband & Telecommunications,
Budget Prepay, Consumer Cellular, Global Connection, TerraCom and Total Call Mobile", Public Notice from FCC
Wireline Competition Bureau, WC Docket Nos. 09-197 and 11-42 (rel. May 25, 2012).

1 **REQUIREMENTS FOR DESIGNATION AS AN ETC AND TOTAL CALL'S**
2 **COMPLIANCE WITH THE REQUIREMENTS**

3 9. Designation as an ETC makes a carrier eligible to receive federal universal service
4 funds. The requirements for designation of ETCs are established in 47 U.S.C. § 214(e)(1), which
5 states:

6 "A common carrier designated as an eligible telecommunications carrier under paragraph
7 (2) or (3) shall be eligible to receive universal service support in accordance with section
8 254 and shall throughout the service area for which the designation is received: (A) offer
9 the services that are supported by Federal universal service support mechanisms under
10 section 254(c), either using its own facilities or a combination of its own facilities and
11 resale of another carrier's services (including the services offered by another eligible
12 telecommunications carrier); and (B) advertise the availability of such services and the
13 corresponding charges using media of general distribution."

14 10. In order to be designated as an ETC, a carrier must offer Lifeline service to all
15 qualifying low-income customers within its service area.¹⁰ Lifeline service provides basic
16 telephone service, typically by passing on discounts to monthly telecommunications charges. As a
17 wireless reseller of prepaid wireless service, Total Call is proposing to offer qualified customers a
18 free handset, free customer care calls, free balance inquiries, access to voice mail, caller I.D. and
19 call waiting features at no additional charge, plus the choice of one (1) of five (5) different prepaid
20 calling plans.¹¹ Total Call also proposes to offer customers the capability of purchasing additional
21 bundles of minutes and service.¹²

22 11. As indicated above, the FCC granted Total Call forbearance from the own-facilities
23 requirement that it provide service using its own facilities or a combination of its own facilities and

24 _____
25 ¹⁰ 47 C.F.R. §§ 54.405 and 54.411(a)

26 ¹¹ See Application, Pages 4 -5 and Response to Staff Data Request at Attachment A. Lifeline Plan 1 offers 250
27 anytime minutes per month with an option of using text, inbound or outbound which consumes 1 Plan minute per text.
28 Lifeline Plans 2, 3, 4, and 5 allows eligible customers to apply the Company's Lifeline discount of \$10.00 to either the
Company's 1000 Talk & 1000 Text retail plan (Lifeline Plan 2), regularly priced at \$29.99 per month, or to the
Company's 30-day Unlimited Talk retail plan (Lifeline Plan 3), regularly priced at \$29.99, or to the Company's 30-
day Unlimited Talk & Text retail plan (Lifeline Plan 4), regularly priced at \$39.99, or to the Company's 30-day
Unlimited Talk, Text & Data retail plan (Lifeline Plan 5), regularly priced at \$49.99.

¹² See RCP, page 21.

1 resale of another carrier's service and also any criteria related to facilities build out plans. Total
2 Call would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other
3 criteria required of ETCs.

4 **A. OFFERING THE SERVICES DESIGNATED FOR SUPPORT**

5 12. 47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to
6 receive Federal universal service fund support. The services and Total Call's response to the
7 provision of each service are as follows:

8 (a) Voice grade access to the Public Switched Network. Total Call states¹³ that it
9 provides voice grade access to the public switched telephone network through the
10 purchase of wholesale CMRS services from Sprint.

11 (b) Local usage. Total Call states¹⁴ it will provide Lifeline customers with minutes of
12 use for local service at no additional charge to customers. As required by the FCC.

13 (c) Access to emergency services. "An ETC must provide its customers with access to
14 911 and E911 emergency services. Total Call states¹⁵ that all of its customers will have
15 access to emergency calling services and that 911 and E911 access will be available
16 from Total Call's handsets even if the account associated with the handset has no
17 minutes remaining.

18 (d) Toll Limitation for Qualifying Low-Income Consumers. ETCs must provide toll
19 limitation services to qualifying low-income customers, unless their Lifeline offering
20 does not distinguish between the pricing of toll and non-toll calls. Total Call's wireless
21 calling plans do not distinguish between non-toll (i.e., local) and toll. Total Call's
22 prepaid plans include a specific number of minutes that cannot be exceeded. Therefore,
23 customers cannot incur any charges for excessive toll calling or be disconnected for
24 non-payment.

25 13. In its Application, Total Call states¹⁶ that it has the ability to provide all of the
26 supported services and functionalities required in the proposed ETC designated service area to all
27 subscribers taking service under its Lifeline plan through wholesale arrangements with its
28 underlying carrier. Based on the above information and explanations, Staff believes that Total Call
meets this ETC designation criteria.

29 ¹³ Application, Page 11.

30 ¹⁴ Application, Pages 11-12.

31 ¹⁵ Application, Page 12.

32 ¹⁶ Application, Pages 4 and 11.

B. ADVERTISING OF SUPPORTED SERVICES

47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. Total Call states it will advertise the availability of its supported services and the corresponding rates and charges in a manner designed to inform the ...

general public.¹⁷ Total Call's advertising will occur through a combination of media channels, such as point of sale materials, brochures, direct mail, other printed materials, retail outlets, and the Internet. Advertisements will be in both English and Spanish. Total Call submitted examples of prior relevant advertisements to Staff. In addition, Total Call submitted an example of its English version advertisement in its RCP to the FCC.¹⁸

14. Based on the information above and Total Call's advertising materials provided to Staff, Staff concludes that Total Call will advertise the availability of its supported services and the corresponding charges using media of general distribution as required by 47 U.S.C. § 214(e)(1)(B). Staff believes that Total Call meets this ETC designation criteria.

C. ADDITIONAL ETC REQUIREMENTS

15. In addition to the requirements listed above, the FCC adopted, in the *Lifeline Reform Order*, comprehensive reforms to the low-income program to revise and modernize the Lifeline service requirements and implement measures to address fraud, waste, and abuse within the system. Below are the additional requirements and Total Call's response to each requirement.

C.1 A Commitment and Ability to Provide Supported Services

16. In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

(i) Certify that it will comply with the service requirements applicable to the support that it receives; and

(ii) Submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network throughout its proposed service area. Each

¹⁷ Application, Page 13.

¹⁸ See Exhibit 4 of the RCP.

applicant shall estimate the area and population that will be served as a result of the improvements. Except, a common carrier seeking designation as an eligible telecommunications carrier in order to provide supported services only under subpart E of this part does not need to submit such a five-year plan.¹⁹

17. Total Call states²⁰ that it will provide Lifeline service to qualifying customers requesting Lifeline services throughout its requested designated services area, pursuant to the universal service program and in accordance with 47 C.F.R. § 54.202(a)(1). Total Call states²¹ that it will provide service to requesting qualifying customers on a timely basis or within a reasonable period of time in accordance with the rule. The requirement directing submissions of a formal network improvement plan under 47 C.F.R. § 54.202(a)(1)(ii) demonstrating how universal service funds will be used to improve coverage, signal strength, or capacity that would not otherwise occur absent the receipt of high-cost support, does not apply to this Application because Total Call is seeking only to provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the facilities-based requirements for Total Call.

18. Based on the above information, Staff believes that Total Call meets this ETC designation criteria.

C.2 Remain Functional in Emergency Situations

19. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant must demonstrate that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”²²

20. To demonstrate its ability to remain functional in emergency situations, Total Call states²³ that it purchases wireless network services on a wholesale basis from Sprint that is itself

¹⁹ *Lifeline Reform Order*, ¶ 386.

²⁰ See Application, Page 11.

²¹ Response to Staff Data Request PJG 1.7.

²² *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March 17, 2005) (“*ETC Minimum Requirements Report and Order*”), ¶ 25.

²³ Response to Staff Data Request PJG 1.18.

1 subject to various regulatory requirements to remain functional in emergencies. Through Sprint,
2 Total Call provides to its customers the same ability to remain functional in emergency situations
3 as currently provided by Sprint to its own customers, including access to a reasonable amount of
4 backup power to ensure functionality without an external power source, the ability to reroute
5 traffic around damaged facilities, and the capability of managing traffic spikes resulting from
6 emergency situations. Therefore, through its underlying carrier(s), Total Call states it has the
7 ability to remain functional in emergency situations.

8 21. Based on the above information, Staff concludes that Total Call has demonstrated
9 its ability to remain functional in emergency situations by maintaining a reasonable amount of
10 back-up power. Staff believes that Total Call meets this ETC designation criteria.

11 C.3 Satisfy Consumer Protection and Service Quality Standards

12 22. In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its
13 commitment to meeting consumer protection and service quality standards in its application.²⁴
14 The sufficiency of other commitments will be considered on a case-by-case basis.

15 23. To demonstrate its ability to satisfy consumer protection and service quality
16 standards, Total Call states²⁵ that it commits to exceptional customer service standards, and also
17 commits to comply with the Cellular Telecommunications and Internet Association's ("CTIA")
18 Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Total Call affirms
19 its commitment to satisfy applicable consumer protection and service quality standards if certified
20 as an ETC.

21 24. Based on the above information, Staff believes that Total Call meets this ETC
22 designation criteria.

23 C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability

24 25. In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to
25 demonstrate that it is financially and technically capable of providing the Lifeline service in
26
27

28 ²⁴ ETC Minimum Requirements Report and Order, ¶ 28.

²⁵ Application, Pages 16-17.

1 compliance with subpart E of this part. In the *Lifeline Reform Order*²⁶ the FCC provides guidance
2 on specific information to be considered when determining if an applicant meets this requirement:

3 “...Among the relevant considerations for such a showing would be whether the applicant
4 previously offered services to non-Lifeline customers, how long its has been in business,
5 whether the applicant intends to rely exclusively on USF distributions to operate, whether
6 the applicant receives or will receive revenue from other sources, and whether it has been
7 subject to enforcement action or ETC revocation proceedings in any state.”

8 26. To demonstrate that Total Call is financially and technically capable of providing
9 Lifeline service, Total Call states²⁷ that it has been in business for six years and began providing
10 telecommunications services in Arizona on January 27, 2006. Total Call currently derives the
11 majority of its revenue from its operations (reselling wireless telecommunications services and/or
12 providing Lifeline telecommunications services) in the states of Michigan, Missouri, Nevada, and
13 California. Total Call states²⁸ it has not and will not be relying exclusively on Lifeline
14 reimbursement for the Company’s operating revenues. As noted on page 2 above, Total Call
15 currently has ETC designation to provide wireless Lifeline services in fourteen (14) states, and
16 Puerto Rico, and currently has petitions for ETC designation pending in sixteen (16) states,
17 excluding Arizona. Total Call is also awaiting designation as an ETC by the FCC in ten (10)
18 states/jurisdictions. Each of Total Call’s six senior management team members average over
19 seventeen (17) years’ experience in the telecommunications industry. Further, it has not been
20 subject to any enforcement action at the FCC or in any state and that no ETC designations held by
21 Total Call have been rescinded, revoked or terminated by the FCC or by any state.

22 27. Having reviewed the financial statements of Total Call’s ultimate parent
23 organization, KDDI Corporation²⁹, the technical experience of Total Call’s senior management,
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26 ²⁶ See *Lifeline Reform Order*, ¶388.

27 ²⁷ See Application, Page 18 and Response to Staff Data Request PJG 1.14.

28 ²⁸ See Total Call’s RCP, Page 23.

29 ²⁹ See Application, Page 18 and Response to Staff Data Request PJG 1-17, Total Call Mobile, Inc. is wholly-owned by Total Call International, Inc. Total Call International, Inc. is wholly-owned by KDDI America, Inc. KDDI America, Inc. is a wholly-owned subsidiary of KDDI Corporation.

1 and based on the above information, Staff believes that Total Call meets this ETC designation
2 criteria.

3 **C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline**
4 **Service Plans**

5 28. In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit
6 information describing the terms and conditions of any voice telephony service plans offered to
7 Lifeline subscribers, including details on the number of minutes provided as part of the plan,
8 additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers
9 plans to Lifeline subscribers that are generally available to the public, it may provide summary
10 information regarding such plans, such as a link to a public website outlining the terms and
11 conditions of such plans.

12 29. Total Call provided Staff with its informational tariff³⁰ in which it describes the
13 calling plans for Lifeline subscribers, including the number of free minutes in each calling plan,
14 along with the terms and conditions of Lifeline service as provided by Total Call. Based on the
15 information contained in Total Call's informational tariff, Staff believes that Total Call meets this
16 ETC designation criteria.

17 **D. STEPS TO LIMIT FRAUD, WASTE AND ABUSE OF THE FUSF**

18 30. In the *Lifeline Reform Order* the FCC adopted various new measures and revised or
19 eliminated other existing measures in order to limit fraud, waste and abuse of the FUSF. These
20 measures include establishing uniform eligibility criteria to qualify for Lifeline services, clarifying
21 the restriction of one Lifeline telephone allowed per household, initial certification and annual re-
22 certification of consumer eligibility, establishing a national lifeline accountability database to
23 ensure and enforce the one-per-household requirement, total elimination of toll limitation support
24 for wireless carriers and a tapered elimination of toll limitation support for landline ETCs,
25 elimination of the Link Up subsidy except on Federally-Recognized Tribal Lands and establishing
26 additional provisions for Universal Service Administrative Company ("USAC") audits.
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28

³⁰ Response to Staff Data Request PJG 1.4 at Attachment B.

1 31. In its RCP, Total Call outlines the steps it will take to limit fraud, waste and abuse
2 of the FUSF and to comply with all applicable Lifeline requirements and implement measures to
3 prevent fraud, waste, and abuse.

4 **E. PUBLIC INTEREST DETERMINATION**

5 32. Under Section 214 of the Act, the FCC and state commissions must determine that
6 an ETC designation is consistent with the public interest, convenience and necessity for rural
7 areas. They also must consider whether an ETC designation serves the public interest consistent
8 with Section 254 of the Act. Congress did not establish specific criteria to be applied under the
9 public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC
10 designation must be analyzed in a manner that is consistent with the purposes of the Act itself,
11 including the fundamental goals of preserving and advancing universal service, ensuring the
12 availability of quality telecommunications services at just, reasonable, and affordable rates and
13 promoting the deployment of advanced telecommunications and information services to all regions
14 of the nation, including rural and high-cost areas.³¹ Accordingly, before designating a carrier as an
15 ETC, the Commission must make an affirmative determination that such designation is in the
16 public interest, regardless of whether the applicant seeks designation in an area served by a rural or
17 non-rural carrier.

18 33. Total Call states that by designating it as a wireless ETC in Arizona, it will serve
19 the public interest and the needs of low-income customers in Arizona by increasing customer
20 choice in the areas it serves. The public interest benefits associated with Total Call's wireless
21 service include larger local calling areas (as compared to traditional wireline carriers), the
22 convenience and personal security afforded by mobile telephone service, the opportunity for
23 customers to receive a high-value wireless plan and emergency services in accordance with FCC
24 Rules. Additionally, ETC status will promote universal service by allowing Total Call to offer
25 wireless service to many low-income customers who may not be able to otherwise have service.
26 Total Call's Lifeline calling plans are designed to provide service to Lifeline consumers who, due
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³¹ ETC Minimum Requirements Report and Order, ¶ 40.

1 to credit or deposit requirements, may not be able to obtain telephone service from more traditional
2 wireline and wireless service providers.

3 **F. DESIGNATED SERVICE AREA**

4 34. The Commission must establish a geographic area for the purpose of determining
5 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §
6 214(e)(2); 47 C.F.R. § 54.201(b). Total Call requests that the Commission designate it as an ETC
7 for service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona,
8 Total Call will provide Lifeline service in many wire centers in the State of Arizona.

9 35. There are a number of wire centers that encompass both tribal lands and non-tribal
10 lands. Some of the tribal lands are served by tribally-owned telephone companies and some of the
11 tribal lands are served by non-tribally owned telephone companies. For those wire centers that
12 encompass tribal lands, Total Call requested to serve the non-tribal areas of each wire center and to
13 serve tribal lands within the service areas of Commission regulated telephone companies and
14 cooperatives only after receiving any and all necessary licenses or other forms of approval that
15 might be required by any Tribe and filing a copy of such licenses or other form of approval with
16 the Commission, with a copy to ALECA's undersigned counsel. Attachment 1 contains the list of
17 wire centers to be served by Total Call.

18 **ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION**

19 36. ALECA is an association of telephone companies and member-owned cooperatives
20 providing local exchange telecommunications services to customers in rural, high cost areas of
21 Arizona. All of ALECA's members are "rural telephone companies" as defined by the Act.
22 ALECA represents telephone companies and cooperatives that are regulated by the Commission as
23 well as Tribally-owned telephone companies which are not regulated by the Commission.

24 **JOINT STIPULATION**

25 37. On November 12, 2013, ALECA and Total Call filed a Stipulation in the docket. In
26 the Stipulation, to address the potential concerns expressed by ALECA, Total Call agreed not to
27 provide Lifeline service to eligible residents residing on Federally-Recognized Tribal Lands in
28 Arizona until Total Call obtained any and all necessary licenses or other forms of approval that

1 might be required by any Tribe and file a copy of such licenses or other form of approval with the
2 Commission in this docket and a copy to ALECA's counsel. In addition, Total Call agreed that its
3 Lifeline enrollment application for Arizona will require an applicant to provide a street address and
4 include a provision that requires an applicant to self-certify under penalty of perjury that they do
5 not reside on Federally-Recognized Tribal Lands or to identify the Federally-Recognized Tribe on
6 the lands of which he or she resides.

7 38. Staff understands that the only Federally-Recognized Tribal Lands that are included
8 in the Joint Stipulation are those served by Commission-regulated telephone companies and
9 cooperatives and for which Total Call has obtained any and all necessary licenses or other forms of
10 approval that might be required by any Tribe.³²

11 STAFF RECOMMENDATIONS

12 39. In addition to the conditions set forth by the FCC, Staff recommends Total Call's
13 Application for designation as an ETC be granted subject to the following conditions:

- 14 a. Total Call shall file a tariff, in this docket through Docket Control, setting forth the
15 rates, terms and conditions for its Lifeline service within thirty (30) days of a
16 Commission Order in this matter;
- 17 b. Total Call shall notify the Commission of any future changes, through Docket
18 Control, to its rates, terms and/or conditions regarding its Lifeline offerings and file
19 such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
- 20 c. Total Call shall make available Lifeline services to qualifying low-income
21 applicants in its ETC service area no later than ninety (90) days after a Commission
22 decision and concurrently notify the Commission, by making a filing in Docket
23 Control, in this docket, of the commencement for such services;
- 24 d. Total Call shall apprise the Commission of any customer complaints that may arise
25 from its ETC service offerings by making a filing in Docket Control in this docket;
- 26 e. Total Call shall provide a regulatory contact to the Commission by making a filing
27 in Docket Control in this docket within thirty (30) days of a Commission decision in
28 this matter;

...

³² In order to provide Lifeline services on Federally-Recognized Tribal Lands served by Tribally-owned telephone companies, Total Call would need to petition the FCC for ETC designation in order to receive FUSF reimbursement.

- 1 f. In the event that Total Call requests to relinquish its ETC status and no longer
2 provide Lifeline services, it must provide notice to both the Commission and its
3 customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107 and any
4 other requirements under Federal law;
- 5 g. Total Call shall submit in Docket Control an annual report by April 15th of each
6 year, beginning April 15, 2014, that contains its total number of Lifeline subscribers
7 and the total amount of Federal USF support received as of December 31 of the
8 previous calendar year and include an affidavit stating that the Lifeline discounts or
9 the equivalent are equal to the amount of total Federal USF support received per
10 line. The annual filing shall be submitted as a compliance item in this docket;
- 11 h. In the event of a Transfer of Control that involves Total Call, a new ETC petition
12 shall be filed with the Commission. This will ensure ETCs undergoing
13 reorganization remain financially viable and able to provide the supported services
14 throughout the designated service areas as originally approved by the Commission;
- 15 i. Total Call shall not expand its Lifeline service beyond the designated service area
16 specified in this Application without acquiring ETC designation from the
17 Commission to serve the additional area; and
- 18 j. Total Call shall not provide Lifeline service to eligible residents residing on
19 Federally-Recognized Tribal Lands in Arizona, served by Commission regulated
20 telephone companies and cooperatives, until after Total Call has obtained any and
21 all necessary licenses or other forms of approval that might be required by any Tribe
22 and filed a copy of such licenses or other form of approval with the Commission in
23 this docket, with a copy to ALECA's undersigned counsel.

CONCLUSIONS OF LAW

18 1. Total Call Mobile, Inc. is a telecommunications company as defined in A.R.S. § 40-
19 201(46) and is a "telecommunications carrier" as defined in 47 U.S.C. § 153(51). Total Call is
20 also a reseller of Commercial Mobile Radio Service as defined in 47 U.S.C. § 20.3 and A.A.C.
21 R14-2-1201(8).

22 2. The Commission has jurisdiction over the subject matter of the Application.

23 3. Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible
24 Telecommunications Carrier must, throughout its designated service area, offer the services that
25 are supported by the Federal Universal Service Support mechanisms either by using its own
26 facilities or a combination of its own facilities and resale of another carrier's services. The carrier
27 must also advertise the availability of such services and the rates for the services using media of
28 general distribution.

1 4. Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area
2 for the purposes of determining universal service obligations and support mechanisms. Total
3 Call's Application applies to the service area consisting of each rate center as listed in Attachment
4 1.

5 5. Total Call meets the requirements for ETC designation under 47 U.S.C. § 214 and
6 C.F.R. § 54.201 *et seq.*, subject to Total Call's compliance with the conditions set forth in Finding
7 of Fact No. 39 herein.

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ORDER

IT IS THEREFORE ORDERED that the Application of Total Call Mobile, Inc. for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the designated service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Total Call Mobile, Inc.'s compliance with the conditions set forth in Finding of Fact No. 39 above.

IT IS FURTHER ORDERED that if Total Call Mobile, Inc. does not comply with the requirements of Finding of Fact No. 39, its designation as an ETC may be revoked after due process.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION

CHAIRMANCOMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, JODI JERICH, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this _____ day of _____, 2013.

JODI JERICH
EXECUTIVE DIRECTOR

DISSENT: _____

DISSENT: _____

SMO:PJG:sms

Decision No. _____

SERVICE LIST FOR: TOTAL CALL MOBILE, INC.
DOCKET NO. T-20870A-12-0500

Mr. Stanley B. Lutz
Bryan Cave LLP
Two N. Central Avenue, Suite 2200
Phoenix, Arizona 85004

Mr. Craig A. Marks
Craig A. Marks, P. C.
10645 N. Tatum Blvd., Suite 200-676
Phoenix, Arizona 85028

Mr. Steven M. Olea
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Ms. Janice M. Alward
Chief Counsel, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

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ATTACHMENT 1

ATTACHMENT 1

<u>WC Code</u>	<u>State</u>	<u>Company Name</u>	<u>Rate Center</u>
AGFIAZSR	AZ	QWEST CORPORATION	PHOENIX
AGULAZXC	AZ	TABLE TOP TELEPHONE CO., INC.	AGUILA
ASFKAZMA	AZ	QWEST CORPORATION	FLAGSTAFF
AZCYAZ03	AZ	QWEST CORPORATION	CASAGRANDE
BCKYAZMA	AZ	QWEST CORPORATION	PHOENIX
BISBAZMA	AZ	QWEST CORPORATION	BISBEE
BLCNAZMA	AZ	QWEST CORPORATION	PHOENIX
BLCYAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	BULLHEADCY
BLCYAZXE	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	BULLHDCYN
BLRGAZXC	AZ	ARIZONA TELEPHONE CO.	BLUE RIDGE
BNSNAZMA	AZ	QWEST CORPORATION	BENSON
BNSNAZSD	AZ	QWEST CORPORATION	BENSON
BONTAZXC	AZ	VALLEY TELEPHONE COOPERATIVE, INC.	BONITA
BOUSAZXC	AZ	FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ	BOUSE
BOWIAZXC	AZ	VALLEY TELEPHONE COOPERATIVE, INC.	BOWIE
BRDSAZMA	AZ	QWEST CORPORATION	PHOENIX
BVDMAZ01	AZ	RIO VIRGIN TELEPHONE CO., INC.	LITTLEFLD
CHNDAZMA	AZ	QWEST CORPORATION	PHOENIX
CHNDAZSO	AZ	QWEST CORPORATION	PHOENIX
CHNDAZWE	AZ	QWEST CORPORATION	PHOENIX
CHVYAZMA	AZ	QWEST CORPORATION	PRESCOTT
CIBCAZXC	AZ	CITIZENS TELECOM CO OF WHT MTNS INC.	WHITERIVER
CIBLAZXC	AZ	FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ	CIBOLA
CLCYAZAA	AZ	SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, INC.	HILDALE
CLDGAZMA	AZ	QWEST CORPORATION	CASAGRANDE
CMVRAZMA	AZ	QWEST CORPORATION	SEDONA
CMVRAZRR	AZ	QWEST CORPORATION	SEDONA
CRCYAZNM	AZ	QWEST CORPORATION	PHOENIX
CRNDAZMA	AZ	QWEST CORPORATION	TUCSON
CSELAZXC	AZ	MIDVALE TELEPHONE EXCHANGE, INC.	CASCABEL
CSGRAZMA	AZ	QWEST CORPORATION	CASAGRANDE
CSRKAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	CASTLEROCK
CTWDAZMA	AZ	NEXTEL COMMUNICATIONS, INC.	SEDONA
CTWDAZSO	AZ	QWEST CORPORATION	SEDONA
CVCKAZMA	AZ	QWEST CORPORATION	PHOENIX
DDVLAZNM	AZ	QWEST CORPORATION	HAYDEN
DEWYAZ01	AZ	MIDVALE TELEPHONE EXCHANGE, INC.	MILLSITE
DGLSAZMA	AZ	QWEST CORPORATION	DOUGLAS
DLKNAZXC	AZ	NAVAJO COMM CO INC - AZ DBA FRONTIER NAVAJO COM	DILKON
DLSPA ZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	LKMHVRNCHS
DNCNAZXC	AZ	COPPER VALLEY TELEPHONE, INC.	VIRDEN
DRVYAZNO	AZ	QWEST CORPORATION	PHOENIX
DTLDAZ01	AZ	ARIZONA TELEPHONE CO.	HYDER
EHRNAZXF	AZ	FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ	EHRENBERG
ELFRAZXC	AZ	COPPER VALLEY TELEPHONE, INC.	ELFRIDA

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ELOYAZ01	AZ	QWEST CORPORATION	CASAGRANDE
ELOYAZ05	AZ	MIDVALE TELEPHONE EXCHANGE, INC.	SILVERBELL
FLGSAZEA	AZ	QWEST CORPORATION	FLAGSTAFF
FLGSAZMA	AZ	QWEST CORPORATION	FLAGSTAFF
FLGSAZSO	AZ	QWEST CORPORATION	FLAGSTAFF
FLRNAZMA	AZ	QWEST CORPORATION	CASAGRANDE
FTDFAZXC	AZ	NAVAJO COMM CO INC - AZ DBA FRONTIER NAVAJO COM	FTDEFIANCE
FTMDAZMA	AZ	QWEST CORPORATION	PHOENIX
FTMDAZNO	AZ	QWEST CORPORATION	PHOENIX
GDYRAZCW	AZ	QWEST CORPORATION	PHOENIX
GLBNAZMA	AZ	QWEST CORPORATION	GILA BEND
GLDLAZMA	AZ	QWEST CORPORATION	PHOENIX
GLOBAZMA	AZ	QWEST CORPORATION	GLOBE
GLVYAZXC	AZ	T-MOBILE USA, INC.	LKHAVASUCY
GNVYAZMA	AZ	QWEST CORPORATION	TUCSON
HGLYAZMA	AZ	QWEST CORPORATION	PHOENIX
HGLYAZQC	AZ	QWEST CORPORATION	PHOENIX
HLBKAZXC	AZ	CITIZENS TELECOM CO OF WHT MTNS INC.	HOLBROOK
HMBLAZMA	AZ	QWEST CORPORATION	PRESCOTT
HRVYAZXC	AZ	ARIZONA TELEPHONE CO.	HARQUHVLVLY
JSCYAZMA	AZ	QWEST CORPORATION	WINSLOW
KGMNAZXC	AZ	NEW CINGULAR WIRELESS PCS, LLC	BULLHEADCY
KGMNAZXE	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	KINGMAN
KIVGAZXC	AZ	HOPI TELECOMMUNICATIONS INCORPORATED - AZ	KYKTSMOVLG
KRNYAZMA	AZ	QWEST CORPORATION	HAYDEN
LEPPAZXC	AZ	NAVAJO COMM CO INC - AZ DBA FRONTIER NAVAJO COM	LEUPP
LHCYAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	LKHAVASUCY
LNBTAZXC	AZ	GILA LOCAL EXCHANGE CARRIER, INC. - AZ	PHOENIX
LTPKAZMA	AZ	QWEST CORPORATION	PHOENIX
MARNAZ02	AZ	QWEST CORPORATION	TUCSON
MARNAZ03	AZ	QWEST CORPORATION	TUCSON
MARNAZMA	AZ	QWEST CORPORATION	TUCSON
MESAAZGI	AZ	QWEST CORPORATION	PHOENIX
MESAAZMA	AZ	QWEST CORPORATION	PHOENIX
MHVYAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	MOHAVE VLY
MIAMAZMA	AZ	QWEST CORPORATION	GLOBE
MMLKAZXC	AZ	ARIZONA TELEPHONE CO.	MORMONLAKE
MMTHAZMA	AZ	QWEST CORPORATION	SAN MANUEL
MRCPAZMA	AZ	QWEST CORPORATION	CASAGRANDE
MSPKAZMA	AZ	QWEST CORPORATION	FLAGSTAFF
NGLSAZMA	AZ	QWEST CORPORATION	NOGALES
NGLSAZMW	AZ	QWEST CORPORATION	NOGALES
NWRVAZMA	AZ	QWEST CORPORATION	PHOENIX
ORCLAZMA	AZ	QWEST CORPORATION	SAN MANUEL

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PEORAZFS	AZ	ACCIPITER COMMUNICATIONS INC	PHOENIX
PERCAZXC	AZ	VALLEY TELEPHONE COOPERATIVE, INC.	PEARCE
PHNXAZ81	AZ	QWEST CORPORATION	PHOENIX
PHNXAZBW	AZ	QWEST CORPORATION	PHOENIX
PHNXAZCA	AZ	QWEST CORPORATION	PHOENIX
PHNXAZEA	AZ	QWEST CORPORATION	PHOENIX
PHNXAZGR	AZ	QWEST CORPORATION	PHOENIX
PHNXAZLV	AZ	QWEST CORPORATION	PHOENIX
PHNXAZMA	AZ	AT&T LOCAL	GLNCNYONCY
PHNXAZMR	AZ	QWEST CORPORATION	PHOENIX
PHNXAZMY	AZ	QWEST CORPORATION	PHOENIX
PHNXAZNE	AZ	QWEST CORPORATION	PHOENIX
PHNXAZNO	AZ	QWEST CORPORATION	PHOENIX
PHNXAZNW	AZ	QWEST CORPORATION	PHOENIX
PHNXAZPP	AZ	QWEST CORPORATION	PHOENIX
PHNXAZPR	AZ	QWEST CORPORATION	PHOENIX
PHNXAZSE	AZ	QWEST CORPORATION	PHOENIX
PHNXAZSO	AZ	QWEST CORPORATION	PHOENIX
PHNXAZSY	AZ	QWEST CORPORATION	PHOENIX
PHNXAZWE	AZ	QWEST CORPORATION	PHOENIX
PIMAAZMA	AZ	QWEST CORPORATION	PIMA
PINEAZMA	AZ	QWEST CORPORATION	PAYSON
PLMNAZMA	AZ	QWEST CORPORATION	BISBEE
PRDMAZXC	AZ	FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ	PARKER DAM
PRDTAZ01	AZ	SAN CARLOS APACHE TELECOMMUNICATIONS UTILITY, INC.	SAN CARLOS
PRKRAZXC	AZ	FRONTIER COMMUNICATIONS OF THE SOUTHWEST INC - AZ	PARKER
PRSCAZEA	AZ	QWEST CORPORATION	PRESCOTT
PRSCAZFW	AZ	TABLE TOP TELEPHONE CO., INC.	INCRPTCNYN
PRSCAZMA	AZ	NEXTEL COMMUNICATIONS, INC.	PRESCOTT
PRTLAZXC	AZ	VALLEY TELEPHONE COOPERATIVE, INC.	PORTAL
PRVYAZPP	AZ	QWEST CORPORATION	PHOENIX
PTGNAZEL	AZ	QWEST CORPORATION	NOGALES
PTGNAZMA	AZ	QWEST CORPORATION	NOGALES
PYSNAZMA	AZ	NEXTEL COMMUNICATIONS, INC.	PAYSON
QRTZAZXC	AZ	SOUTHWESTERN TELEPHONE CO.	QUARTZSITE
RSVTAZXC	AZ	ARIZONA TELEPHONE CO.	ROOSEVLTlk
SALMAZXC	AZ	SOUTHWESTERN TELEPHONE CO.	SALOME
SASBAZXC	AZ	ARIZONA TELEPHONE CO.	SASABE
SCDLAZMA	AZ	QWEST CORPORATION	PHOENIX
SCDLAZSH	AZ	QWEST CORPORATION	PHOENIX
SCDLAZTH	AZ	QWEST CORPORATION	PHOENIX
SCDMAZ89	AZ	MIDVALE TELEPHONE EXCHANGE, INC.	PHOENIX
SEDNAZMA	AZ	QWEST CORPORATION	SEDONA
SEDNAZSO	AZ	QWEST CORPORATION	SEDONA

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SFFRAZMA	AZ	QWEST CORPORATION	SAFFORD
SGMNAZXC	AZ	TABLE TOP TELEPHONE CO., INC.	SELIGMAN
SMTNAZMA	AZ	QWEST CORPORATION	SOMERTON
SNDRAZXC	AZ	TABLE TOP TELEPHONE CO., INC.	SANDERS
SNMNAZMA	AZ	QWEST CORPORATION	SAN MANUEL
SNRSAZXA	AZ	TOHONO O'ODHAM UTILITY AUTHORITY	SANTA ROSA
SNSMAZXC	AZ	VALLEY TELEPHONE COOPERATIVE, INC.	SAN SIMON
SNWFAZXC	AZ	CITIZENS TELECOM CO OF WHT MTNS INC.	SNOWFLAKE
SPRRAZMA	AZ	QWEST CORPORATION	SUPERIOR
SPRSAZEA	AZ	QWEST CORPORATION	PHOENIX
SPRSAZMA	AZ	QWEST CORPORATION	PHOENIX
SPRSAZWE	AZ	QWEST CORPORATION	PHOENIX
SRVSAZMA	AZ	QWEST CORPORATION	SIERRAVIST
SRVSAZNO	AZ	QWEST CORPORATION	SIERRAVIST
SRVSAZSO	AZ	QWEST CORPORATION	SIERRAVIST
STFDAZMA	AZ	QWEST CORPORATION	CASAGRANDE
STJHAZXB	AZ	CITIZENS TELECOM CO OF WHT MTNS INC.	ST JOHNS
STMCAZXE	AZ	NAVAJO COMM CO INC - UT DBA NAVAJO COMM UT	MONUMNTVLY
TCSNAZCA	AZ	QWEST CORPORATION	TUCSON
TCSNAZCO	AZ	QWEST CORPORATION	TUCSON
TCSNAZCR	AZ	QWEST CORPORATION	TUCSON
TCSNAZEA	AZ	MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.- AZ	TUCSON
TCSNAZFW	AZ	QWEST CORPORATION	TUCSON
TCSNAZMA	AZ	BANDWIDTH.COM CLEC, LLC - AZ	HAYDEN
TCSNAZML	AZ	QWEST CORPORATION	TUCSON
TCSNAZNO	AZ	QWEST CORPORATION	TUCSON
TCSNAZRN	AZ	QWEST CORPORATION	TUCSON
TCSNAZSE	AZ	QWEST CORPORATION	TUCSON
TCSNAZSO	AZ	QWEST CORPORATION	TUCSON
TCSNAZSW	AZ	QWEST CORPORATION	TUCSON
TCSNAZTV	AZ	QWEST CORPORATION	TUCSON
TCSNAZWE	AZ	QWEST CORPORATION	TUCSON
TEMPAZMA	AZ	QWEST CORPORATION	PHOENIX
TEMPAZMC	AZ	QWEST CORPORATION	PHOENIX
TLSNAZMA	AZ	QWEST CORPORATION	PHOENIX
TMBSAZMA	AZ	QWEST CORPORATION	TOMBSTONE
TNBSAZXC	AZ	ARIZONA TELEPHONE CO.	ROOSEVTLTK
TNCKAZMA	AZ	QWEST CORPORATION	PAYSON
TUBCAZMA	AZ	QWEST CORPORATION	TUCSON
TXTNAB	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	PEACH SPG
VAILAZNO	AZ	QWEST CORPORATION	TUCSON
VAILAZSO	AZ	QWEST CORPORATION	TUCSON
WCBGAZMA	AZ	QWEST CORPORATION	WICKENBURG
WDRNAZXC	AZ	NAVAJO COMM CO INC - AZ DBA FRONTIER NAVAJO COM	WIDE RUINS

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WHTKAZMA	AZ	QWEST CORPORATION	PHOENIX
WHTLAZMA	AZ	QWEST CORPORATION	WHITLOW
WIKPAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	WIKIEUP
WLCXAZMA	AZ	QWEST CORPORATION	WILLCOX
WLMSAZMA	AZ	QWEST CORPORATION	FLAGSTAFF
WLTNAZMA	AZ	QWEST CORPORATION	YUMA
WNBGAZ01	AZ	QWEST CORPORATION	PHOENIX
WNSLAZMA	AZ	QWEST CORPORATION	WINSLOW
YONGAZXC	AZ	MIDVALE TELEPHONE EXCHANGE, INC.	YOUNG
YUCCAZXC	AZ	CITIZENS UTILITIES RURAL DBA FRONTIER UT RURAL	YUCCA
YUMAAZFT	AZ	QWEST CORPORATION	YUMA
YUMAAZMA	AZ	TIME WARNER CABLE INFO SVCS (ARIZONA), LLC - AZ	YUMA
YUMAAZSE	AZ	QWEST CORPORATION	YUMA